

# WATER QUALITY M E M O R A N D U M

## Utah Coal Regulatory Program

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June 25, 2009

TO: Internal File

THRU: James D. Smith, Permit Supervisor *JS 06/24/09*

FROM: April A. Abate, Environmental Scientist II *(GAA) 6-29-09*

RE: 2009 First Quarter Water Monitoring, Plateau Mining Corporation (PMC), Willow Creek Mine, C/007/0038-WQ09-01 Task ID #3239

The Willow Creek Mine is in reclamation. The mines have been closed and sealed. The disturbed areas around the portals have been regraded and seeded. The most recent surface operations took place in Willow Creek Canyon, about a mile from the junction between U.S. Highway 6 and State Highway 191. The reclaimed area in Crandall Canyon is also part of the Willow Creek permit area.

There are no ground water sites monitored during the reclamation phase.

1. Was data submitted for all of the MRP required sites? YES ☒ NO ☐

Under the reclamation plan, surface water monitoring is required for sites listed in Exhibit 7-3 and shown on Map 15.

**Springs-** There are no springs monitored during the reclamation phase.

**Streams-** There are six surface water-monitoring sites:  
B3N (Willow Creek above power plant),  
B-5 (Price River below processing plant above Willow Creek),  
B-6 (Price River above coal processing plant),  
B25 (Crandall Canyon Creek),  
B26 (lower reach of Crandall Canyon)  
B151 (Willow Creek – 3 miles above Willow Creek Mine)

The reclamation sampling water quality list is presented in Section 13, p. 28. Sampling is conducted quarterly. PMC tries to monitor the sites within a two week period from March 15<sup>th</sup>, June 10<sup>th</sup>, September 5<sup>th</sup> and November 30<sup>th</sup> to attempt to

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collect data that coincides with first thaw, spring high flow, end of summer low-flow and last sample before freeze-up.

All required stream sampling locations were monitored for the quarter on March 30, 2009. No flow was reported from the Crandall Canyon sampling points (B25 and B26).

**Wells-** There are no operational monitoring wells.

**UPDES-** There are no currently active UPDES monitoring locations at the site.

2. **Were all required parameters reported for each site?** YES ☒ NO ☐

3. **Were any irregularities found in the data?** YES ☒ NO ☐

The surface water samples from the Price River (B5 and B6) were reported outside of reported outside of two standard deviations for compounds such as sodium, magnesium and chloride. All of these compounds are associated with salt and may be receiving the road salt from the winter season.

Total Dissolved Solids (TDS) is a recognized pollutant for the Price River Watershed. TDS standards for this section of the Price River Watershed are set at 1,700 mg/L based on the Utah Administrative Code Rule R317-2. Stream samples collected continue to remain well below this standard.

4. **On what date does the MRP require a five-year resampling of baseline water data.**

Baseline data were collected at the beginning of mining operations for a two-year period but routine 5-year sampling is not specified in MRP. It should be updated at mid-term or five year renewal.

5. **Based on your review, what further actions, if any, do you recommend?**

The Permittee has been using the laboratory to collect dissolved oxygen and conductivity parameters. These parameters should be analyzed in the field to get the most accurate results. Conductivity results from the laboratory have been showing for the past several quarters data that are outside of normal ranges, thereby questioning the data integrity. The Permittee has been issued an NOV (#10039) on June 26, 2009 for failing to use field instrumentation for specific conductivity as stipulated in the Willow Creek MRP.